

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA**

SHANDLE MARIE RILEY,

*Plaintiff,*

~v~

HAMILTON COUNTY GOVERNMENT,

DANIEL WILKEY,  
individually and in his capacity as deputy sheriff  
for Hamilton County Government, and

JACOB GOFORTH,  
individually and in his capacity as deputy sheriff  
for Hamilton County Government,

*Defendants.*

§

§ **Case No. 1:19-cv-304**

§ Judge Travis R. McDonough

§ Magistrate Judge Christopher H. Steger

§

**JURY DEMANDED**

§

Consolidated

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1:19-cv-198

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1:19-cv-305

§

1:19-cv-329

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**1:19-cv-348**

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1:20-cv-16

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1:20-cv-17

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1:20-cv-19

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1:20-cv-20

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1:19-cv-44

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**MOTION TO WITHDRAW – M.R.S.**

Movants, counsel for Plaintiff, pursuant to Tenn. Sup. Ct. R., Rule 8, RPC 1.16(a) and (b), and E.D.TN. LR 83.4, move this Court for permission to withdraw as counsel of record for Plaintiff M.R.S.

**Introduction:**

Tenn. Sup. Ct. R., Rule 8, RPC 1.6(b)(5), allow Movants to disclose certain amounts of information relating to the representation to establish a claim on behalf of Movants.

**Basis for Motion:**

Movants' continued representation of Plaintiff will result in a violation of the Rules of Professional Conduct. See Tenn. Sup. Ct. R., Rule 8, RPC 1.16(a)(1). The rule that will be violated is RPC 1.4 (communication).

**Prerequisites to Motion:**

Movants certify to the Court that they delivered a notice of Movants' intent to file this motion to withdraw more than 14 days from the date Movants filed this instant motion, and that the Plaintiff has a right to appear at the hearing of the motion.

No hearing date on the motion is set at this time; however, Movants shall serve the Plaintiff at least seven (7) days before the hearing (excluding Saturdays, Sundays and holidays) with notice (1) of the date, time and place of the hearing, and (2) that the Plaintiff has a right to appear and be heard on the motion once Movants obtain a hearing date from the Clerk of Court and this Court.

The Plaintiff's last known contact information is as follows:

[a]. Phone Numbers and Addresses:

Catherine White, Esq. (GAL) (423) 280-0943  
1016 Dallas Road, Suite 203  
Chattanooga, TN 37405

Debra Cummings (Plaintiff's mother) (423) 208-3244  
2123 Mowbray Pike  
Soddy Daisy, TN 37379

Plaintiff (423) 403-1691  
Email: [mroseswartz@gmail.com](mailto:mroseswartz@gmail.com)

**Wherefore,** Movants move this Court to set this motion for a hearing and grant leave to Movants to withdraw as Counsel for the Plaintiff.

Respectfully submitted,

**\*\*signatures and certificate of service on next page\*\***

By: /s/ Robin Ruben Flores

**ROBIN RUBEN FLORES**

**TENN. BPR #20751**

**GA. STATE BAR #200745**

Counsel for Plaintiff and Movant

4110-A Brainerd Road

Chattanooga, TN 37411

423 / 267-1575 fax 267-2703

robin@robinfloreslaw.com

**THE COCHRAN FIRM MID-SOUTH**

/s/ Howard B. Manis (by permission)

**HOWARD B. MANIS**

**TENN. BPR #16202**

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Memphis, TN 38103

(901) 523-1222

*Attorney for the Plaintiff*

[hmanis@cochranfirmmidsouth.com](mailto:hmanis@cochranfirmmidsouth.com)

**THE COCHRAN FIRM MID-SOUTH**

/s/ Andrew C. Clarke (by permission)

**ANDREW C. CLARKE**

**TENN. BPR # 15409**

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Memphis, TN 38103

(901) 523-1222

*Attorney for the Plaintiff*

[acclarke@cochranfirmmidsouth.com](mailto:acclarke@cochranfirmmidsouth.com)

\*\*certificate of service on next page\*\*

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following named persons with a true and exact copy of this motion to withdraw by placing a true and exact copy of said motion in the United States Mail, addressed to PLAINTIFF c/o the Guardian ad Litem:

Address #1:  
Plaintiff c/o  
Catherine White, Esq. (GAL)  
1016 Dallas Road, Suite 203  
Chattanooga, TN 37405

I also certify that I have delivered a copy of this motion to all persons noted on the electronic filing receipt.

DATE: February 4, 2021

BY: /s/ Robin Ruben Flores